

Appln No. 09/690,066
Amdt date August 22, 2005
Reply to Office action of June 22, 2005

REMARKS/ARGUMENTS

Applicants thank the Examiner for his careful consideration of this application. In response to the above-identified Office action, Applicants amend the application and seek reconsideration, re-examination and allowance thereof. In this response Applicants do not add any new claims. Applicants amend claims 1, 50, 92, 117 and 131. Applicants do not cancel any claims. Accordingly, claims 1, 2, 4-52, 54-119 and 121-161 remain pending.

I. Interview

Applicants' attorney conducted an interview with the Examiner on July 26, 2005. Applicants' attorney reviewed the disclosure of the present invention and attempted to clarify the subject matter that was intended to be claimed and the subject that distinguished the present invention from the references cited in the application as well as references cited in other applications owned by the assignee that have similar disclosures and subject matter. The rejections and claims of this application were not specifically discussed, however, claims from another application were discussed. The discussion of the claims of the other application was directly relevant to the present application.

While no formal agreement was reached on claim language, the Examiner and Applicants' attorney discussed language to clarify the functionality of the cryptographic modules. Specifically, the language "each of the plurality of

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cryptographic modules is programmable to service any of the user terminals" was discussed. The Examiner indicated that the use of this language would likely distinguish the claims in the set of applications under discussion, including the present application, from the prior art cited in each of the applications. The independent claims have been amended to include this language or similar language in light of the Interview.

II. Claims Rejected Under 35 U.S.C. §103

Claims 1, 2, 4-51, 54-94, 96-119 and 121-161 are rejected under 35 U.S.C. §103 as being obvious over U.S. Patent No. 6,005,945 issued to Whitehouse (hereinafter "Whitehouse") in view of U.S. Patent No. 6,233,565 issued to Lewis (hereinafter "Lewis"). Applicants respectfully request that the rejection be withdrawn.

To establish a *prima facie* case of obviousness, the Examiner must show that the cited references, combined, teach or suggest each of the elements of the claim. In regard to independent claims 1, 50, 92, 117 and 131 these claims as submitted, include the elements of "each of the plurality of cryptographic devices is programmable to service any of the plurality of user terminals," as recited in claim 1, or similar language including "wherein each of the plurality of cryptographic devices processes data for any user" and "wherein each of the cryptographic devices accesses data elements for any of the user terminals." As noted above in regard to the

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interview on July 26, 2005. Applicants do not believe that Whitehouse and Lewis teach or suggest these elements of the independent claims. Rather Whitehouse teaches a system that uses a general central processing unit (CPU) and programs stored in memory to service a user. See Fig. 4 of Whitehouse. Further, user data is stored in a specific central computer in a customer database 172. See Whitehouse col. 8, lines 56-58. Thus, Whitehouse does not teach a "plurality of cryptographic modules ... programmable to service any ... user" as recited in the amended independent claim 1. Lewis does not cure this defect of Whitehouse. Lewis discloses a system where there is a one to one relationship between users and postal security devices (PSDs). See Lewis, col. 6, lines 60-63. Therefore, the independent claims, as amended, are not obvious over Whitehouse in view of Lewis. Accordingly, reconsideration and withdrawal of the obviousness rejection of claims 1, 50, 92, 117 and 131 are requested.

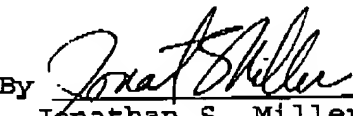
In regard to claims 2, 4-49, 51, 54-91, 93, 94, 96-116, 118, 119, 121-130 and 132-161, these claims depend from independent claims 1, 50, 92, 117 and 131, respectively, and incorporate the limitations thereof. Thus, at least for the reasons mentioned above in regard to independents claim 1, 50, 92, 117 and 131, these claims are not obvious over Whitehouse in view of Lewis. Accordingly, reconsideration and withdrawal of the obviousness rejection of these claims are requested.

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Conclusion

In view of the foregoing, it is believed that all claims now pending, namely claims 1, 2, 4-52, 54-119 and 121-161 patentably define the subject invention over the prior art of record and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving this application forward to allowance, the Examiner is encouraged to contact the undersigned at (626) 795-9900.

Respectfully submitted,
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